

Aries Pension & Insurance Systems Ltd

## Privacy Policy

*Last updated 11 May 2018*

### Introduction

Aries Pension & Insurance Systems Ltd (Aries) is a company whose business purpose is to provide: a) technical information on the laws and regulations governing pensions and pension schemes in the UK and other states such as Ireland and Australia; b) assistance for its business customers to share such information between themselves; and c) computer systems for carrying out certain pension benefit calculations. Aries is owned and controlled by its directors Gary Chamberlin and Ian Neale and is not a part of any other business group.

Aries collects and holds personal data in order to maintain business contact with its customers, suppliers and others, including the submission of legal documents, invoices and general correspondence; also for sending out marketing and other information related to its business purpose; and for liaising with customers, suppliers and others by phone where this is appropriate in furtherance of its business purpose. The personal data consists essentially of the name, company, email address, telephone number and job title or function of those concerned. Aries has a strict policy of not collecting or holding any personal data beyond that which is reasonably required for the fulfilment of its business purpose.

Aries is the Data Controller of the personal data it collects and holds.

### Lawful Basis

Under the GDPR, Aries is required to specify the lawful basis under which it carries out the processing of personal data. The basis chosen, following a formal assessment, is that of "Legitimate Interest". Under this basis, Aries uses personal data only where it has a proper reason to do so in furtherance of its business purpose or in fulfilment of a legal duty. Aries acknowledges that it has a responsibility to protect the interests of those whose personal data it collects and holds: in particular to ensure they suffer no detriment through the use Aries makes of their data.

### Gathering Personal Data

Aries collects personal data directly from those concerned or from their business colleagues, by means of face to face meetings, email correspondence, telephone calls and data entered into the Aries website. Aries also collects personal data from *Linked In*, but does not use *Facebook* for collecting any personal data.

### Sharing Personal Data

Aries shares personal data with its marketing contractor Achieving Quality Leads Ltd (AQL) of Hitchin, but will on request withhold or withdraw the data from AQL. AQL holds the data securely and uses it for Aries purposes only, as instructed by the Directors of Aries. Aries also shares certain personal data with its customers with the aim of assisting them to share useful information on pensions technical matters. Aries does not share personal data with any third parties apart from AQL and its customers unless with written permission, or unless required to do so by UK law.

### Security of Personal Data

Aries holds the personal data in secure computer systems accessible only by the Directors or by trusted long-serving staff members authorised by them. None of the personal data is held online, other than a) in the list of Aries customer representatives, and b) in postings made by staff members of Aries customers on the Aries Discussion Forum. In both cases, such data is held within a secure website accessible only to Aries staff and to other Aries customers. Requests from customer representatives for their details to be removed, or not placed on the representatives list to begin with, or for a Discussion posting to be removed, are honoured without undue delay.

### [Sending Personal Data outside the EEA](#)

Aries does not send personal data outside the European Economic Area (EEA) unless to comply with a duty under UK law.

### [Deletion of Personal Data](#)

Aries will accede quickly to any request it receives from an individual to delete their personal data from the Aries records unless there is a significant business or legal reason for not doing so. Aries will delete personal data from its records where there is no longer a reason for it to be kept in support of the business purpose of Aries. An interval of up to three years may be allowed, in case of any questions or complaints arising in respect of the data, or for a later change of situation in which the data may again become relevant to the Aries business purpose.

### [Rights of Data Subjects](#)

Aries acknowledges that personal data is protected by legal rights. Data subjects have the right, at any time, to:

- gain access to their personal data as held by Aries
- get their personal data from Aries in a format that can easily be re-used.
- ask Aries to correct their personal data if it is wrong or incomplete.
- object to Aries use of their personal data
- complain about how Aries has used their personal data
- ask Aries to delete their personal data if there is no need for Aries to keep it.

Data subjects can contact Aries for any of the above reasons by emailing [gdpr@ariespensions.co.uk](mailto:gdpr@ariespensions.co.uk) or by writing to: The Data Controller, Aries Pension & Insurance Systems Ltd, Aries House, 29c Station Road, Desborough, Northants NN14 2RL Aries will provide a data subject with their personal data on demand, and will take immediate steps to update it if appropriate or to correct it if it is wrong.

Data subjects also have the right to complain to the Information Commissioner's Office (ICO) <https://ico.org.uk/concerns/>